

CENTENNIAL COMMUNICATIONS

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November 1, 2002

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David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW

Federal Communication Commission
Bureau/Office

Washington, DC 20554

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Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

**Re: First Quarterly of Centennial Communications Corp.
OOPhase II E911 Compliance**

Dear Messer's Solomon and Sugrue:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ Centennial Communications Corp. ("Centennial") hereby files its first Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Because Centennial provides CMRS service in two distinct markets, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets.

I. Puerto Rico

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 -- Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this MTA.² A single PSAP serves Centennial's entire service area in Puerto Rico. Centennial has not yet received a request for Phase I or II E911 service from this sole PSAP. However, we note that we have been in regular contact with the PSAP, and we are aware that the PSAP has begun the planning and implementation process for both Phase I and Phase II E911 service. Previously, we reported to the FCC that the PSAP in Puerto Rico expected to submit their request for Phase I/II E911

¹ FCC 02-210, released July 26, 2002

² On September 26, 2001, Centennial Puerto Rico License Corp. electronically filed an "Amended Report on E911 Deployment Requirements" in which we advised the Commission that Centennial had decided to switch our E911 Phase II solution for the Puerto Rico market from a handset-based solution to a network-based solution.

service to us in early 2003. However, the PSAP is in the process of completely renovating its entire E911 system, and a recent Request for Proposal ("RFP") process held by the PSAP relating to the renovation was unsuccessful and will be repeated in the next few months. We have been advised that the delay in this RFP process likely will result in a PSAP delay in requesting E911 service from Centennial. Centennial attended the first PSAP RFP planning meeting on August 19, 2002, and we intend to attend any future planning meetings to monitor the PSAP's progress. By attending these planning meetings, we hope to be able to coordinate our E911 Phase II implementation process with the PSAP's process.

In addition, Centennial now provides service to the U.S. Virgin Islands of St. Croix and St. Thomas. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,¹ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Grayson Wireless to deploy Phase II E911 in its domestic markets.⁴

Phase I Service - Attachment A to this letter is a list of all PSAPs to which Centennial presently is providing Phase I E911 service, and the date that Phase I E911 service was timely implemented. As the chart shows, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. We note that Phase I E911 service is fully deployed in our Texas markets. Centennial also notes that, to date, we have not received any valid requests for Phase I (or Phase II) E911 service from PSAPs in the state of Ohio. Presumably, this is due to the fact that Ohio has not yet passed an E911 cost-recovery system for the PSAPs.

Phase II Service - As Centennial previously has advised the Commission, we are implementing Grayson Wireless' "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets.⁵ Presently, we are in the pre-deployment engineering stage of the Phase II implementation process. Centennial has not yet received any Phase II E911 service requests from PSAPs in Mississippi, Ohio or Texas. A list of all Phase II PSAP requests that we have received thus far, along with their status, can be found at Attachment B. The main points to be derived from this chart are summarized below.

¹ Baucse Communications of Beaumont, Inc., Centennial Micbiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ **See** Centennial Communications Corp. Amended Report on E911 Reporting Requirements, tiled September 9, 2002.

⁵ *Id.*

In Indiana, we are working with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group ("Indiana Board") in coordinating Phase II E911 deployment. Thus far, we have received five valid PSAP requests. These requests came from PSAPs in the following counties – the date the PSAP request was received is also noted

<u>County</u>	<u>Date Received</u>
Allen County	February 2, 2001
Elkhart County	January 23, 2001
Miami County	April 17, 2002
Steuben County	October 23, 2000
Wells County	March 2, 2002

We anticipate initiating Phase II service in Steuben County in January 2003, and the remaining four counties by the March 1, 2003 deadline. Centennial intends to continue to work with the PSAPs in Indiana that have not yet perfected their Phase II requests, and to continue to work with the Indiana Board, to develop the most aggressive Phase II deployment schedule possible for these counties.

In Louisiana, we have received Phase II E911 service requests from PSAPs in the following three parishes on the dates noted: Iberia Parish (April 8, 1997), Iberville Parish (January 27, 2000) and Lafayette Parish (December 20, 2000). We have determined that the Lafayette Parish Phase II request is valid, and anticipate implementing Phase II service there in February 2003. The validity of the Phase II requests from the Iberia and Iberville parishes was unclear, and we are working with those PSAPs to clarify their status. If these requests are deemed to be valid, the planned implementation date is March 1, 2003. Finally, in Michigan, we have received a single Phase II request from a PSAP in St. Joseph County, and are working to determine the validity of this request. If deemed valid, Centennial anticipates implementing service in that county by the March 1, 2003 deadline.

Because no deployment benchmark deadlines have yet passed, Centennial has nothing to report in this regard.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

David Solomon
Thomas J. Sugrue
November 1, 2002
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Sincerely,

/s/ Lourdes L. Lucas

Lourdes L. Lucas
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ATTACHMENT A

List of PSAPs Receiving Phase I Service

Centennial Communications Corp. –Domestic Markets
Phase I E911 Requests – Implementation Dates

State	County	PSAP Name	Implementation Date
IN	Adams	Adams County Sheriffs Department	1/10/2001
IN	Allen	Allen County Sheriffs Dept.	3/31/1998
IN	Allen	Ft. Wayne City Communications	3/31/1998
IN	Allen	New Haven Police Department	3/31/1998
IN	Allen	Three Rivers Paramedic	3/31/1998
IN	Blackford	Blackford County Central Dispatch	4/14/2000
IN	Carroll	Carroll County Sheriffs Department	4/21/1999
IN	Cass	Cass County Sheriffs Department	6/28/2001
IN	Cass	Logansport Police Department	6/28/2001
IN	Clinton	Clinton County 91 1	5/29/1999
IN	De Kalb	Auburn Police Department	8/2/2000
IN	De Kalb	DeKalb County Police E911	8/2/2000
IN	De Kalb	Garrett Police and Fire Department	8/2/2000
IN	Elkhart	Elkhart County Public Safety Communications Center	10/8/1998
IN	Elkhart	Elkhart Police Department	10/8/1998
IN	Elkhart	Nappanee Police Department	10/8/1998
IN	Fulton	Rochester Police Department	12/5/2000
IN	Grant	Grant County Sheriffs Office	2/22/2000
IN	Grant	Marion Police Department	2/22/2000
IN	Huntington	Huntington County Sheriffs Office	3/29/1999
IN	Huntington	Huntington Police Department	3/29/1999
IN	Jasper	Jasper County Sheriffs Office	1/23/2001
IN	Jay	Jay County Sheriffs Department	1/10/2001
IN	Kosciusko	Kosciusko County Sheriffs Office	5/24/2001
IN	Kosciusko	Warsaw Police Department	5/24/2001
IN	La Porte	LaPorte County Sheriffs Office	9/19/2002
IN	Lagrange	Lagrange County Sheriff's Office	5/21/2001
IN	Marshall	Marshall County Sheriffs Office	1/24/2001
IN	Miami	Miami County Sheriffs Office	4/13/1999
IN	Miami	Peru Police Department	4/13/1999
IN	Noble	Kendalville Police Department	5/18/2001
IN	Noble	Noble County Sheriffs Office	5/18/2001
IN	Rush	Rush County Sheriffs Office	9/26/2002
IN	Rush	Rushville Police Department	9/26/2002
IN	St Joseph	Mishawaka Fire Department	2/17/1999
IN	St Joseph	Mishawaka Police Department	2/17/1999
IN	St Joseph	South Bend Police Department	2/17/1999
IN	St Joseph	St Joseph County 91 1	2/17/1999
IN	St Joseph	St Joseph County Fire Dispatch	2/17/1999
IN	Starke	Starke County Sheriffs Office	5/25/2001
IN	Steuben	Steuben County Communications	8/4/1998
IN	Wabash	North Manchester Police Department	6/28/2001
IN	Wabash	Wabash County Sheriffs Office	6/28/2001
IN	Wabash	Wabash Police Department	6/28/2001
IN	Wells	Bluffton Police Department	4/30/1999
IN	Whitley	Columbia City Police Department	5/18/2001

Centennial Communications Corp. – Domestic Markets
Phase I E911 Requests –Implementation Dates

State	County	PSAP Name	implementation Date
IN	Whitley	Whitley County Communications Center	5/18/2001
IN Count			47
LA	Lafayette	Acadian Ambulance Service	7/27/1999
LA	Lafayette	Lafayette Parish Communications District	7/27/1999
LA Count			2
MI	Branch	Branch County Central Dispatch	10/23/2001
MI	Cass	Cass County Sheriffs Department	10/3/2001
MI	St Joseph	St Joseph County Central Dispatch	9/28/2001
MI	St Joseph	Sturgis Police Department	9/28/2001
MI	Van Buren	South Haven Police Department	10/23/2001
MI	Van Buren	Van Buren County Central Dispatch	10/23/2001
MI Count			6
TX	Hardin	Hardin County Sheriffs Department	8/25/2000
TX	Hardin	Silsbee Police Department	8/25/2000
TX	Jefferson	Beaumont Police Department	8/25/2000
TX	Jefferson	Jefferson County Sheriffs Department	8/25/2000
TX	Jefferson	Nederland Police Department	8/25/2000
TX	Jefferson	Port Arthur Police Department	8/25/2000
TX	Orange	Bridge City Police Department	8/25/2000
TX	Orange	Orange County Sheriffs Department	8/25/2000
TX	Orange	Orange Police Department	8/25/2000
TX	Orange	Pinehurst Police Department	8/25/2000
TX	Orange	Vidor Police Department	8/25/2000
TX Count			11
Grand Count			66

ATTACHMENT B
List of Phase II Requests

**Centennial Communications Corp.
Phase II E911 Requests**

State	County	PSAP Name	Valid	Request Date
IN	Allen	Allen County Sheriffs Dept.	Yes	02/02/01
IN	Blackford	Blackford County Central Dispatch	No	08/10/01
IN	Carroll	Carroll County Sheriffs Department	No	08/14/01
IN	Cass	Cass County Sheriffs Department	No	06/29/01
IN	De Kalb	DeKalb County Police E911	No	11/17/00
IN	Elkhart	Elkhart County Public Safety Communications Center	Yes	01/23/01
IN	Franklin	Franklin County Sheriffs Department	No	04/13/01
IN	Fulton	Rochester Police Department	No	05/21/01
IN	Grant	Grant County Sheriffs Office	No	01/10/01
IN	Howard	Kokomo Police Department	No	11/06/01
IN	Kosciusko	Kosciusko County Sheriffs Office	No	06/20/01
IN	Lagrange	Lagrange County Sheriffs Office	No	11/07/01
IN	Miami	Miami County Sheriffs Office	Yes	04/17/02
IN	Rush	Rush County Sheriffs Office	No	01/23/01
IN	Wabash	Wabash County Sheriff's Office	No	07/02/01
IN	Wayne	Wayne County Sheriffs Department Communications Center	No	07/16/01
IN	Wells	Bluffton Police Department	Yes	03/02/02
LA	Iberia	Iberia Parish Sheriffs Office	Unknown	04/08/97
LA	Iberville	Iberville Parish 911	Unknown	01/27/00
LA	Lafayette	Lafayette Parish Communications District	Unknown	12/20/00
MI	St Joseph	St Joseph County Central Dispatch	Unknown	07/23/02